

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL ACTION NO. 07-04
	§	
VANIVAN DEON FULLER	§	

**MOTION FOR LEAVE TO EXTEND TIME
FOR FILING MOTIONS AND MEMORANDUMS**

TO THE HONORABLE JOSEPH J. FARNAN, JR., UNITED STATES DISTRICT JUDGE FOR
THE DISTRICT OF DELAWARE:

NOW COMES the Defendant, VANIVAN DEON FULLER, who, by and through his attorney of record, ROBERT G. TURNER, respectfully moves this Honorable Court to allow him to file further motions and to amend motions presently filed, if necessary, for a reasonable time after receipt of those materials made available to him by the Government pursuant to the pending motions and upon receipt of materials pursuant to diligent investigation by the defense. Therefore the Defendant would show unto this Honorable Court the following:

I.

Defendant Vanivan Deon Fuller and his attorney have engaged in negotiations and talks with the Government regarding a resolution of these charges. As such, some disclosure from the Government has occurred, but not all discovery has been completed. Upon conclusion of discovery and investigation thereof, the Defendant may find that additional motions are necessary to address issues not known at this time.

WHEREFORE, the Defendant, VANIVAN DEON FULLER, respectfully prays that this Honorable Court grant an extension of time in which to file pre-trial motions and memorandums pending completion of discovery and pre-trial hearing.

The undersigned has attempted to confer with Assistant United States Attorney Ilana H. Eisenstein by telephone on March 20, 2008 but was unable to speak with her.

SIGNED: /s/ Robert G. Turner

ROBERT G. TURNER, Bar I.D. # 3313
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Attorney for: VANIVAN DEON FULLER

Date: March 20, 2008

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Motion for Leave to Extend Time For Filing Motions and Memorandums has been delivered via electronic mail from the Clerk of the Court to Mr. Douglas McCann/Ms. Ilana H. Eisenstein, Assistant United States Attorney, on this the 20th day of March, 2008.

/s/ Robert G. Turner

ROBERT G. TURNER

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ORDER

On this day came on to be heard Defendant's Motion for Leave to Extend Time for Filing Motions and Memorandums, and after the Court having considered the same is of the opinion that said Motion should be and is hereby GRANTED/DENIED.

SIGNED and ENTERED this the ____ day of _____, 2008.

UNITED STATES DISTRICT JUDGE